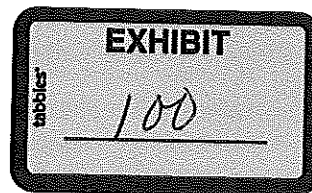


MAC
Manufacturing Alliance of Connecticut, Inc.
173 Interstate Lane
Waterbury, CT 06705



BUREAU OF WATER PROTECTION AND LAND REUSE
OFFICE OF THE BUREAU CHIEF

JAN 28 2010

Paul Stacey
Bureau of Water Protection & Land Reuse
State Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Proposed Stream Flow Regulations - RCRA sections 26-141b-1 to 26-141b-9, inclusive.

Dear Mr. Stacey

The Manufacturing Alliance of Connecticut - the largest trade association in Connecticut dedicated exclusively to manufacturing issues - urges the rejection of the proposed stream flow regulations, as currently drafted.

Under the proposed stream flow regulations, water companies will face strict requirements regarding the amount of groundwater that they can pump and the amount of water they must release from reservoirs into rivers and streams. As a result, many water companies throughout Connecticut will struggle to meet current water demands and be unable to meet demands for future growth

Clearly, inadequate public water supplies will disrupt manufacturing in those areas. Every manufactured product uses water during some part of the production process. Industrial water use includes water used for such purposes as fabricating, processing, washing, diluting, cooling, or transporting a product; incorporating water into a product; or for sanitation needs within the manufacturing facility. Some industries that use large amounts of water produce such commodities as food, paper, chemicals, refined petroleum, or primary metals. These industries will be negatively impacted by the proposed regulations.

In addition, water rates are expected to increase significantly under the proposed regulations because water companies will have to spend enormous amounts to modify impoundments and develop new sources of water supply to comply with the regulations. This will increase costs for the state's manufacturers, who are already struggling in a difficult economy.

We are also concerned that the proposed regulations will divert staff and resources away from other critical programs, such as brownfields remediation and permit processing, creating further delays and costs in remediating brownfields and obtaining the permits needed to operate in Connecticut.

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The proposed stream flow regulations simply do not balance protections for the state's fish with the need to provide for the water needs of the state's manufacturers and other industries. Manufacturers in Connecticut have survived many difficult economic cycles. Despite the market upheaval of 2008 and the ongoing credit crisis, Connecticut manufacturers continue to be the engine of Connecticut's economy. We must therefore take steps to preserve our manufacturing sector and reject proposed regulations that will further impair the ability of Connecticut manufacturers to be competitive.

For these reasons, we urge your rejection of the proposed stream flow regulations.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Johnson', with a stylized, cursive flourish at the end.

Frank Johnson
President
Manufacturing Alliance of Connecticut

Cc: The Honorable M. Jodi Rell